

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA
Civil Action No.: 1:21-cv-00814-CCE-LRW

LARISSA HARPER HAIRGROVE,)
Plaintiff,)
v.)
CITY OF SALISBURY, DOWNTOWN) MOTION FOR SUMMARY JUDGMENT
SALISBURY INC., and LANE BAILEY, in) BY DEFENDANTS CITY OF
his individual and official capacity,) SALISBURY AND LANE BAILEY IN
Defendants.) HIS OFFICIAL CAPACITY

COME now Defendants, City of Salisbury and Lane Bailey, in his official capacity, and respectfully move the Court for summary judgment as to all of Plaintiff's claims in this matter. As shown herein, there is no genuine issue of material fact and they are entitled to judgment as a matter of law.

Specifically, Defendants' motion is based upon and supported by the pleadings, deposition transcripts, documents and other discovery in this matter. Defendants are also entitled to summary judgment for the reasons more specifically provided in the Memorandum of Law in support of Defendants' Motion for Summary Judgment filed contemporaneously herewith.

WHEREFORE, Defendants, City of Salisbury and Lane Bailey, in his official capacity, respectfully request that this Court grant their motion for summary judgment as to all Plaintiff's claims and that all claims against these Defendants be dismissed with prejudice.

This the 3rd day of April, 2023.

CRANFILL SUMNER LLP

By:/s/ Patrick H. Flanagan

Patrick H. Flanagan, NC Bar #17407
Stephanie H. Webster, NC Bar #12164
Attorneys for Defendants
Post Office Box 30787
Charlotte, NC 28230
Telephone (704)332-8300
Facsimile (704) 332-9994
phf@cshlaw.com
swebster@cshlaw.com

CERTIFICATE OF SERVICE

This is to certify that the undersigned has this day electronically filed the foregoing
**MOTION FOR SUMMARY JUDGMENT BY DEFENDANTS CITY OF SALISBURY
AND LANE BAILEY IN HIS OFFICIAL CAPACITY** with the Clerk of Court using the
CM/ECF system and served the same on all of the parties to this cause addressed as follows:

Valerie L. Bateman June K. Allison valerie@newsouthlawfirm.com june@newsouthlawfirm.com <i>Attorneys for Plaintiff</i>	G. Bryan Adams, III Bryan.adams@vrplaw.com <i>Attorney for Defendant Downtown Salisbury, Inc.</i>
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This the 3rd day of April, 2023.

CRANFILL SUMNER LLP

By:/s/ *Patrick H. Flanagan*

Patrick H. Flanagan, NC Bar #17407
Stephanie H. Webster, NC Bar #12164
Attorneys for Defendants
Post Office Box 30787
Charlotte, NC 28230
Telephone (704)332-8300
Facsimile (704) 332-9994
phf@cshlaw.com
swebster@cshlaw.com